

# EXHIBIT 2

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

*In re Flint Water Cases 16-10444*

\_\_\_\_\_/ *The Hon. Judith E. Levy*

*Bellwether III Case No. 17-10164*

\_\_\_\_\_/

**DECLARATION OF COREY M. STERN, ESQ.**

Pursuant to 28 U.S.C. § 1746, I, Corey M. Stern, hereby declare as follows:

1. I am a partner with the law firm Levy Konigsberg, LLP.
2. I was trial counsel for and continue to represent the four bellwether plaintiffs to the first bellwether jury trial, which began on February 15, 2022, and which ended in a mistrial on August 11, 2022.
3. I know who Francis X. Ferrara (“Ferrara”) is, and I would recognize him in any setting, based on the time I have spent litigating cases associated with the Flint Water Crisis and the time he has spent in various courtroom settings and on numerous Zoom hearings/meetings.
4. I personally observed Ferrara present in the courtroom for virtually the entirety of the first bellwether trial.
5. During the trial, I personally observed Ferrara, and an individual named

Pierre Farcot, talking in the courtroom and hallways, as well as on multiple occasions looking at and discussing something on a cellular telephone.

Respectfully submitted, this the 17<sup>th</sup> day of January, 2023.

**LEVY KONIGSBERG, LLP**

/s/ COREY M. STERN

Corey M. Stern  
605 Third Avenue, 33<sup>rd</sup> Floor  
New York, New York 10158  
(212) 605-6200  
(212) 605-6290 (facsimile)  
[csfern@levylaw.com](mailto:csfern@levylaw.com)